

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
WILLIAMSPORT DIVISION**

IN RE:)	
)	
MATTHEW BATEMAN)	Case No.: 1:18-03445 HWV
BRENDA BATEMAN)	Chapter 13
Debtor(s))	
)	
QUICKEN LOANS)	
Movant)	
)	
v.)	
)	
MATTHEW BATEMAN)	
BRENDA BATEMAN)	
)	
Respondent(s))	
)	
CHARLES J. DEHART, III)	
Trustee)	

OBJECTION TO MOTION FOR RELIEF FROM STAY

TO THE HONORABLE JUDGES OF THE U.S. BANKRUPTCY COURT:

Debtors, through their attorney, Sean P. Quinlan, Esquire, hereby represents as follows:

- 1. On or about August 18, 2018, the debtors filed a Chapter 13 Petition with this Court.**
- 2. The debtors plan as filed scheduled Quicken Loans, as mortgage holder on the debtors investment property located at 3957 Bush Court, Abingdon MD which plan proposed to sale and liquidate the property and pay 100% to all unsecured creditors with the nonexempt funds.**
- 3. On October 22, 2019 the Attorney for Quicken Loans filed a Motion for Relief from Stay stating that the debtors were deficient on their post-petition mortgage payments. The debtors were contacted and informed counsel that they have a contract for sale of the stated real property. Debtors will be preparing and filing a Motion to sale said property within the next ten days which amount will satisfy the debt total owed to Quicken in full.**
- 4. For the above stated reason, the debtors through Counsel, requests that Quicken Loans Motion for Relief from Stay be denied. That the debtors be allowed to continue with the Stay protection**

and continue to sale the investment property as this property is for the benefit of the estate and equity must be used for this purpose.

WHEREFORE, Debtors, through undersigned, requests that this Honorable Court deny Quicken Loans Motion for Relief from Stay.

Dated: 11/11/2019

**/s/ Sean P. Quinlan, Esquire
Sean P. Quinlan, Attorney for Debtors**